UNITED STATES OF AMERICA Before The POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001 POSTAL BATE BUS TELLED OF THE SEGRETARY

RECEIVED

DEC 7 2 30 PM '01

Postal Rate and Fee Changes, 2001

Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE INTERROGATORIES TO UNITED STATES POSTAL SERVICE WITNESS: LESLIE M. SCHENK (OCA/USPS-T43-2) December 7, 2001

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-1-21 dated September 28, 2001, are hereby incorporated by reference.

Respectfully submitted,

Acting Director

Office of the Consumer Advocate

EMMETT RAND COSTICH Attorney

1333 H Street, N.W. Washington, D.C. 20268-0001 (202) 789-6830; Fax (202) 789-6819 OCA/USPS-T43-2. Please refer to USPS-LR-J-58, which is cited in the response to VP/USPS-4, Attachment A.

- a. Please refer to the table entitled "TY 03 Unit Mail Processing Costs" in Attachment A. Please confirm that the sum of each of the 0-1 oz, 1-2 oz, and 2-3 oz columns equals the mail processing unit costs for First-Class Single Piece, First-Class Presort, and Standard Regular for each weight range found in USPS-LR-J-58. If you do not confirm, please explain and provide the unit costs by cost pools to permit calculation of First-Class Single Piece, First-Class Presort, and Standard Regular mail processing unit costs for the 0-1 oz, 1-2 oz, and 2-3 oz weight ranges.
- b. Please refer to the table entitled "Unit Cost Difference 2-3 oz. To 0-1 oz." in Attachment A. Please explain the reasons for calculating the unit cost difference in the "All but 'Other" row. Why were the unit cost difference figures in the "Other pools" excluded from the calculation of the "All but 'Other" row?
- Please provide the electronic spreadsheets used in the development of Attachment A.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.

Suphanii Claure Stephanie Wallace

Washington, D.C. 20268-0001 December 7, 2001